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JUL 17 2001

July 17, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

**NOTICE OF EX PARTE
PRESENTATION**

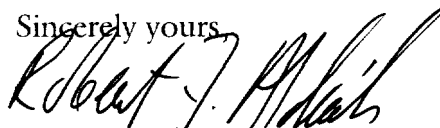
Re: CC Docket No. 96-128 (remand of inmate service issues)

Dear Ms. Salas:

On July 13, 2001, Vince Townsend of Pay-Tel Communications, Inc., Michelle Barnard of Odyssey International, and Robert F. Aldrich of this law firm, representing the Inmate Calling Service Providers Coalition, met with Jeff Carlisle, Deputy Chief of the Common Carrier Bureau, and Chris Libertelli, Assistant to the Bureau Chief.

We discussed the proceeding regarding inmate calling services on remand from the United States Court of Appeals for the D.C. Circuit. We discussed the Coalition's positions of record and the additional points summarized on the enclosed documents which were handed out at the meeting.

Sincerely yours,



Robert F. Aldrich

RFA/nw
Enclosures

cc: Jeff Carlisle
Chris Libertelli

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JUL 17 2001

**SUPPLEMENTARY POINTS ON LEGAL ISSUES
CONCERNING A SHORT-TERM APPROACH****FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

As noted in our letter of June 29, 2001, the short-term approach discussed here would be fully consistent with the U.S. court of appeals decisions in *Illinois Pub. Telecomms. Ass'n v. FCC*, 117 F.3d 555 (D.C. Cir. 1997)(“*IPTA*”) and *MCI Telecomms. Corp. v. FCC*, 143 F.3d 606 (D.C. Cir. 1998)(“*MCP*”). Unlike the dial-around compensation cases, where the courts found that the record did not support the Commission’s decision to link dial-around compensation to the market-based local coin call rate, here the record amply supports linking the local calling element of local collect call rates to the market based local coin rate.

- In approximately 45 states, for many years the local calling element of the local collect call rate have been set equal to either current or prior local coin rates.
- State commissions have explicitly recognized the linkage.
 - As explained by the Pennsylvania Public Utilities Commission, “As with local exchange carrier coin telephones, consumers using COCOTs are offered the opportunity to charge the cost of placing a local call, usually a quarter, on credit. This service is designed to allow customers who do not have a quarter to place a local call and can be an important service in emergency situations.”
- The Commission need not make new findings as to similarities of cost between collect calls and local coin calls. The equivalence of charges already exists in state tariffs.
- The Commission would adhere to the preexisting approach and rationale for setting the local calling element of local collect call rates equal to the local coin rate, but would merely update that approach to take account of the deregulation of local coin calls.
- As shown in the record of this proceeding, the Commission would be following the precedent of 30 states that have already updated that approach, and allowing service providers in the remaining states to use the same market-based approach to the local calling element that is used in the 30 states.

**What Message Will the FCC Send to
100's of Sheriffs Operating Small County Jails and
1000's of Inmates and Their Families**

Confinement Facility	Sheriff	City	STATE	ADP*	# of Phones	Local Collect Call Rate
Tyrrell County Jail	Fred Hemilright	Columbia	NC	2	2	\$0.85
Hyde County Jail	David T. Mason	Swan Quarter	NC	4	4	\$0.85
Jones County Jail	Robert R. Mason	Trenton	NC	4	4	\$0.85
Clay County Jail	Tony Woody	Hayesville	NC	6	3	\$0.95
Yancey County Jail	Kermit Banks	Burnsville	NC	6	3	\$0.95
Greer City Jail	Kenneth Westmorland**	Greer	SC	8	6	\$0.80
Ashe County Jail	James C. Hartley	Jefferson	NC	17	4	\$0.85
Clifton Forge City Jail	Todd L. Tyler	Clifton Forge	VA	18	5	\$1.00
Currituck County Jail	Susan D. Johnson	Currituck	NC	19	6	\$0.85
Washington County Jail	Stanley R. James	Plymouth	NC	19	4	\$0.85
Alleghany County Jail	C. E. Simpson	Covington	VA	20	4	\$1.00
Guilford Juvenile Detention Ctr.	B. J. Barnes	Greensboro	NC	21	5	\$1.05
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Lincoln County Jail	Barbara A. Pickens	Lincolnton	NC	47	7	\$1.05
Stokes County Jail	Mike C. Joyce	Danbury	NC	49	2	\$0.85
Botetourt County Jail	Ronald N. Sprinkle	Fincastle	VA	50	8	\$1.00
Wilkes County Jail	Dane C. Mastin	Wilkesboro	NC	53	11	\$0.85
Person County Jail	Dennis M. Oakley	Roxboro	NC	55	15	\$0.85
Surry County Jail	Connie R. Watson	Dobson	NC	80	12	\$0.85
				Average Rate:		\$0.90

* Average Daily Population of Inmates

**Administrator

50 State Nationwide Average Local Collect Call Rate:

\$2.13

**After Five (5) Years Since The Telecom Act
With Rates That Do Not Cover Costs
We Will Be Forced To Discontinue Service To Small County Jails.**

CONSUMER COMPLAINTS SURVEY, JUNE 2001

30 STATES CONTACTED: AL, AR, AZ, CA, CT, DE, FL, GA, HI, ID, IN, KS, ME, MI, MO, ND, NE, NH, NM, NA, OH, OR, RI, SD, UT, WA, WI, WV, WY
20 RESPONSES, 10 RESPONSES PENDING

State Contacted	Department	Complaints Incr/Decr	How Many Complaints	Complaint Type of Call
1	Consumer Services	Increasing	Very Few	Long Distance
2	Telecommunications Quality of Services	Same	None	n/a *
3	Consumer Services	Same	Very Few	Long Distance
4	Consumer Assistance & Information	Not Tracked *	Not Tracked *	Not Tracked *
5	Consumer Services	Increasing	Very Few	Not Tracked *
6	Consumer Affairs	Decreasing	Few	Long Distance
7	Consumer Services	Same	None	n/a *
8	Consumer Division	Same	Very Few	Long Distance
9	Consumer Services	Same	None	n/a *
10	Public Affairs Division	Same	Very Few	Long Distance
11	Public Relations	Decreasing	Very Few	Not Tracked *
12	Consumer Services	Not Tracked *	Not Tracked *	Not Tracked *
13	Consumer Services	Same	Few	Long Distance
14	Consumer Services	Same	Few	Long Distance
15	Consumer Services	Same	Very Few	Not Tracked *
16	Consumer Complaint Resolution	Same	Very Few	Long Distance
17	Consumer Services	Same	Very Few	Not Tracked *
18	Administration	Increasing	Few	Not Tracked *
19	Consumer Affairs	Same	Few	Not Tracked *
20	Public Information Office	Same	Few	Long Distance

* Not Included in percentage calculations

FAILURE TO DELIVER ON SECTION 276 MANDATES HAS KILLED COMPETITION

<u>Previous Providers</u>	<u>Status</u>	<u>Current Coalition Providers</u>
AmeriTel Pay Phones, Inc.	Sold	Evercom
Blair Communications	Sold	Global Telink
Coin Telephone, Inc.	Sold	Pay Tel Communications, Inc.
Consolidated Communications, Inc.	Sold	Public Communications Services, Inc.
Correctional Communications Corp	Sold	
DGI Communications	Out of Business	
Executone Corrections Division	Sold	
Harris Corp	Sold	
Intellicall, Inc.	Out of Inmate Business	
InVision Telecom, Inc.	Sold	
Kantel	Sold	
KR&K	Sold	
London Communications, Inc.	Sold	
M.O.G. Communications, Inc.	Sold	
North American Communications	Out of Business	
North American Intelcom	Sold	
OPUS	Declared Bankruptcy 2000	
PayCom	Out of Business	
Payphone Systems	Sold	
Paytel of America	Sold	
Peoples Telephone, Inc.	Sold	
Robert Cefale & Associates	Sold	
Saratoga Telephone	Sold	
Security Telecom	Sold	
Talton Communications	Sold	
Tataka	Sold	
Tel America	Sold	
Tele-Quip Labs Inc.	Sold	
Teltrust	Declared Bankruptcy 2001	
OAN - Billing and Collection Services For Inmate Industry Phone Service	Declared Bankruptcy June 2001	

Send reply to: <merickson@paytel.com>
From: "Mary Erickson" <merickson@paytel.com>
To: <vtownsend@paytel.com>
Subject: SC Independent Inmate Phone Service Providers
Date sent: Tue, 3 Jul 2001 15:05:29 -0400

Vince,

The Independent Inmate Phone Service Providers in business in South Carolina in 1995 were:

Brock Communications
Executone
ICC of California
Invision
Pay Tel Communications Inc.
Peoples
RC&A
Silverado
Talton

Presently, to our knowledge, the only Independent Inmate Phone Service Providers in the State of South Carolina, with contracts for county jails are:

Pay Tel Communications Inc.
Evercom

In the last five (5) years Pay Tel Communications Inc. has installed or has a contract to install an Inmate Phone System in three (3) facilities in SC, thirty-three (33) in Georgia, and six (6) in Florida.

Mary Erickson
Marketing/Sales Analyst
Pay Tel Communications Inc.
9-A Oak Branch Dr
Greensboro, NC 27407
1-800-PAY-TELL ext 233

Send reply to: <merickson@paytel.com>
From: "Mary Erickson" <merickson@paytel.com>
To: <vtownsend@paytel.com>
Subject: NC Independent Inmate Phone Service Providers
Date sent: Tue, 3 Jul 2001 15:04:50 -0400

Vince,

The Independent Inmate Phone Service Providers in business in North Carolina in 1995 were:

Coin Telephone
Executone
ICC of California
Invision
Paycom
Pay Tel Communications Inc.
RC&A
Talton

Presently, to our knowledge, the only Independent Inmate Phone Service Providers in the State of North Carolina, with contracts for county jails are:

Pay Tel Communications Inc.
Evercom

In the last three years Pay Tel Communications Inc. has installed or has a contract to install an Inmate Phone System in twenty(20)facilities in NC, thirty-three (33) in Georgia, and six (6) in Florida.

Mary Erickson
Marketing/Sales Analyst
Pay Tel Communications Inc.
9-A Oak Branch Dr
Greensboro, NC 27407
1-800-PAY-TELL ext 233

Ordering and Billing Forum Issue Identification Form

OBF Issue Number		1553
Date Submitted		8/12/97
Date Accepted	8/13/97	at OBF #59
Initial Closure	4/21/98	at OBF #62
Final Closure	11/2/98	at OBF #64
Issue Category		Resolved

Part A, Page 1

Issue Title: Processing of Misdirected Messages in a Post-LNP Environment

Issue Statement: : When an alternately billed message is directed incorrectly to the incumbent company due to a Billing Validation Database timeout or failure, the incumbent company should forward the message unto the appropriate company. The incumbent company is the only company with knowledge of the billing company ownership due to the regionality of the LSMS databases.

Impact of Other Issues or Procedures:

Desired Results: Determine how to process misdirected messages.

Committee Assignment:
Associated Committee:

Issue Champion: Stephanie Cowart
Address: 600 N 19TH Street
Birmingham, AL 35244

Company: BellSouth
Telephone: 205-321-6760

Resolution:

Section 7.3 Message Return Criteria and Section 7.8 Local Number Portability in the EMI Document will be updated to include "Special Processing Requirements for returns due to change in Local Service Provider (Return Code 50)" for exchange carrier and interexchange carrier calls.

7.3 Message Return Criteria

General

Every effort should be made to return the message to the sender in its original format/content. This includes Unbillable, Post Billing Adjustments and Uncollectible records.

Special Processing Requirements for Returns Due to Change in Local Service (Return Code 50)

Note: This process does not apply to any other defined return codes.

EC (Exchange Carrier) Calls

Traditionally, EC (Exchange Carrier) calls that bill outside the originating EC territory are sent to the perceived billing EC. If the calls are unbillable solely as a result of a change in EC/LSP (Local Service Provider), it is the responsibility of the perceived EC/LSP to forward the calls to the correct EC/LSP and not return them to the originating company for reason defined as Return Code 50.

Interexchange Carrier Calls

Interexchange Carrier calls that are billed by an EC will be sent to the perceived billing EC (Exchange Carrier). If the customer has changed Local Service Providers and the Interexchange Carrier does not know the true billing Local Service Provider, the perceived Local Service Provider will return the calls to the Interexchange Carrier using Return Code value 50 and if known will populate the LSPID (Local Service Provider ID, e.g. Company Code) in positions 168-171.

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Greer City Jail	Kenneth Westmorland**	Greer	SC	8	6	\$0.80
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Clifton Forge City Jail	Todd L. Tyler	Clifton Forge	VA	18	5	\$1.00
Currituck County Jail	Susan D. Johnson	Currituck	NC	19	6	\$0.85
Washington County Jail	Stanley R. James	Plymouth	NC	19	4	\$0.85
Alleghany County Jail	C. E. Simpson	Covington	VA	20	4	\$1.00
Guilford Juvenile Detention Ctr.	B. J. Barnes	Greensboro	NC	21	5	\$1.05
Polk County Jail	David R. Satterfield	Columbus	NC	23	5	\$1.03
Chowan County Jail	Fred A. Spruill	Edenton	NC	24	4	\$0.85
Greene County Jail	Lemmie Smith	Snow Hill	NC	25	6	\$0.85
Yadkin County Jail	Michael C. Cain	Yadkinville	NC	25	7	\$0.85
Alexander County Jail	Ray Warren	Taylorsville	NC	28	5	\$1.05
Alleghany County Jail	Mike Caudill	Sparta	NC	30	8	\$1.05
Pamlico County Jail	Daniel A. Miller	Bayboro	NC	30	5	\$0.85
Davie County Jail	William A. Whitaker	Mocksville	NC	31	5	\$0.85
Smith County Jail	Johnny C. Bane	Carthage	TN	34	8	\$0.85
Caswell County Jail	J. I. Smith, Jr	Yanceyville	NC	35	7	\$0.85
Warren County Jail	Johnny M. Williams	Warrenton	NC	36	10	\$0.85
Chatham County Jail	Isaac L. Gray	Pittsboro	NC	38	2	\$0.85
Lincoln County Jail	Barbara A. Pickens	Lincolnton	NC	47	7	\$1.05
Stokes County Jail	Mike C. Joyce	Danbury	NC	49	2	\$0.85
Botetourt County Jail	Ronald N. Sprinkle	Fincastle	VA	50	8	\$1.00
Wilkes County Jail	Dane C. Mastin	Wilkesboro	NC	53	11	\$0.85
Person County Jail	Dennis M. Oakley	Roxboro	NC	55	15	\$0.85
Surry County Jail	Connie R. Watson	Dobson	NC	80	12	\$0.85
				Average Rate:		\$0.90

* Average Daily Population of Inmates

**Administrator

50 State Nationwide Average Local Collect Call Rate:

\$2.13

**After Five (5) Years Since The Telecom Act
With Rates That Do Not Cover Costs
We Will Be Forced To Discontinue Service To Small County Jails.**

CONSUMER COMPLAINTS SURVEY, JUNE 2001

30 STATES CONTACTED: AL, AR, AZ, CA, CT, DE, FL, GA, HI, ID, IN, KS, ME, MI, MO, ND, NE, NH, NM, NA, OH, OR, RI, SD, UT, WA, WI, WV, WY
 20 RESPONSES, 10 RESPONSES PENDING

State Contacted	Department	Complaints Incr/Decr	How Many Complaints	Complaint Type of Call
1	Consumer Services	Increasing	Very Few	Long Distance
2	Telecommunications Quality of Services	Same	None	n/a *
3	Consumer Services	Same	Very Few	Long Distance
4	Consumer Assistance & Information	Not Tracked *	Not Tracked *	Not Tracked *
5	Consumer Services	Increasing	Very Few	Not Tracked *
6	Consumer Affairs	Decreasing	Few	Long Distance
7	Consumer Services	Same	None	n/a *
8	Consumer Division	Same	Very Few	Long Distance
9	Consumer Services	Same	None	n/a *
10	Public Affairs Division	Same	Very Few	Long Distance
11	Public Relations	Decreasing	Very Few	Not Tracked *
12	Consumer Services	Not Tracked *	Not Tracked *	Not Tracked *
13	Consumer Services	Same	Few	Long Distance
14	Consumer Services	Same	Few	Long Distance
15	Consumer Services	Same	Very Few	Not Tracked *
16	Consumer Complaint Resolution	Same	Very Few	Long Distance
17	Consumer Services	Same	Very Few	Not Tracked *
18	Administration	Increasing	Few	Not Tracked *
19	Consumer Affairs	Same	Few	Not Tracked *
20	Public Information Office	Same	Few	Long Distance

* Not Included in percentage calculations

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Blair Communications	Sold	Global Telink
Coin Telephone, Inc.	Sold	Pay Tel Communications, Inc.
Consolidated Communications, Inc.	Sold	Public Communications Services, Inc.
Correctional Communications Corp	Sold	
DGI Communications	Out of Business	
Executone Corrections Division	Sold	
Harris Corp	Sold	
Intellicall, Inc.	Out of Inmate Business	
InVision Telecom, Inc.	Sold	
Kantel	Sold	
KR&K	Sold	
London Communications, Inc.	Sold	
M.O.G. Communications, Inc.	Sold	
North American Communications	Out of Business	
North American Intelecom	Sold	
OPUS	Declared Bankruptcy 2000	
PayCom	Out of Business	
Payphone Systems	Sold	
Paytel of America	Sold	
Peoples Telephone, Inc.	Sold	
Robert Cefale & Associates	Sold	
Saratoga Telephone	Sold	
Security Telecom	Sold	
Talton Communications	Sold	
Tataka	Sold	
Tel America	Sold	
Tele-Quip Labs Inc.	Sold	
Teltrust	Declared Bankruptcy 2001	
OAN - Billing and Collection Services For Inmate Industry Phone Service	Declared Bankruptcy June 2001	

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Send reply to: <merickson@paytel.com>
From: "Mary Erickson" <merickson@paytel.com>
To: <vtownsend@paytel.com>
Subject: SC Independent Inmate Phone Service Providers
Date sent: Tue, 3 Jul 2001 15:05:29 -0400

Vince,

The Independent Inmate Phone Service Providers in business in South Carolina in 1995 were:

Brock Communications
Executone
ICC of California
Invision
Pay Tel Communications Inc.
Peoples
RC&A
Silverado
Talton

Presently, to our knowledge, the only Independent Inmate Phone Service Providers in the State of South Carolina, with contracts for county jails are:

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Evercom

In the last five (5) years Pay Tel Communications Inc. has installed or has a contract to install an Inmate Phone System in three (3) facilities in SC, thirty-three (33) in Georgia, and six (6) in Florida.

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Marketing/Sales Analyst
Pay Tel Communications Inc.
9-A Oak Branch Dr
Greensboro, NC 27407
1-800-PAY-TELL ext 233

Send reply to: <merickson@paytel.com>
From: "Mary Erickson" <merickson@paytel.com>
To: <vtownsend@paytel.com>
Subject: NC Independent Inmate Phone Service Providers
Date sent: Tue, 3 Jul 2001 15:04:50 -0400

Vince,

The Independent Inmate Phone Service Providers in business in North Carolina in 1995 were:

- Coin Telephone
- Executone
- ICC of California
- Invision
- Paycom
- Pay Tel Communications Inc.
- RC&A
- Talton

Presently, to our knowledge, the only Independent Inmate Phone Service Providers in the State of North Carolina, with contracts for county jails are:

- Pay Tel Communications Inc.
- Evercom

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Ordering and Billing Forum Issue Identification Form

OBF Issue Number		1553
Date Submitted		8/12/97
Date Accepted	8/13/97	at OBF #59
Initial Closure	4/21/98	at OBF #62
Final Closure	11/2/98	at OBF #64
Issue Category		Resolved

Part A, Page 1

Issue Title: Processing of Misdirected Messages in a Post-LNP Environment

Issue Statement: : When an alternately billed message is directed incorrectly to the incumbent company due to a Billing Validation Database timeout or failure, the incumbent company should forward the message unto the appropriate company. The incumbent company is the only company with knowledge of the billing company ownership due to the regionality of the LSMS databases.

Impact of Other Issues or Procedures:

Desired Results: Determine how to process misdirected messages.

Committee Assignment:

Associated Committee:

Issue Champion: Stephanie Cowart
Address: 600 N 19th Street
Birmingham, AL 35244

Company: BellSouth
Telephone: 205-321-6760

Resolution:

Section 7.3 Message Return Criteria and Section 7.8 Local Number Portability in the EMI Document will be updated to include "Special Processing Requirements for returns due to change in Local Service Provider (Return Code 50)" for exchange carrier and interexchange carrier calls.

Ordering and Billing Forum

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7.3 Message Return Criteria

General

Every effort should be made to return the message to the sender in its original format/content. This includes Unbillable, Post Billing Adjustments and Uncollectible records.

Special Processing Requirements for Returns Due to Change in Local Service (Return Code 50)

Note: This process does not apply to any other defined return codes.

EC (Exchange Carrier) Calls

Traditionally, EC (Exchange Carrier) calls that bill outside the originating EC territory are sent to the perceived billing EC. If the calls are unbillable solely as a result of a change in EC/LSP (Local Service Provider), it is the responsibility of the perceived EC/LSP to forward the calls to the correct EC/LSP and not return them to the originating company for reason defined as Return Code 50.

Interexchange Carrier Calls

Interexchange Carrier calls that are billed by an EC will be sent to the perceived billing EC (Exchange Carrier). If the customer has changed Local Service Providers and the Interexchange Carrier does not know the true billing Local Service Provider, the perceived Local Service Provider will return the calls to the Interexchange Carrier using Return Code value 50 and if known will populate the LSPID (Local Service Provider ID, e.g. Company Code) in positions 168-171.

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